

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

JUANA VILLEGAS,)	
)	
Plaintiff,)	
)	
v.)	No. 3:09-0219
)	
THE METROPOLITAN GOVERNMENT OF)	Judge Haynes
NASHVILLE AND DAVIDSON COUNTY,)	
)	
Defendant.)	

THE METROPOLITAN GOVERNMENT'S EXHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(B) and the Court's Order Setting this case for a trial on damages (Doc. No. 120), the Metropolitan Government submits the following exhibit list:

I. Exhibits That the Metropolitan Government Expects To Offer.

1. *Curriculum Vitae* of Dr. Bennett Spetalnick;
2. *Curriculum Vitae* of Dr. Robert Barth;
3. Plaintiff's medical records from Nashville General Hospital (Bates Nos. 003647-003696, 003723-003814);
4. Psychological testing of Dr. Boero;
5. Excerpts from Expert Report of Lisbedth Cardona;
6. Excerpts from Expert Report of Dr. Jorge Boero;
7. Excerpts from Expert Report of Dr. Jill DeBona;
8. Excerpts from Expert Report of Dr. Sandra Torrente;
9. Plaintiff's medical records from Cool Springs Family Medicine (Bates No. 3817-3824);
10. *Villegas De La Paz v. Holder*, 614 F.3d 605 (6th Cir. 2010); and
11. *Villegas De La Paz v. Holder*, 640 F.3d 650 (6th Cir. 2010).

II. Exhibits That the Metropolitan Government May Offer if the Need Arises.

12. Intake Report of Lisbedth Cardona;
13. Intake Assessment from New Day Psychiatric Services;
14. Dr. DeBona's notes from interview of Plaintiff;
15. Dr. Torrente's notes from interview of Plaintiff;
16. Plaintiff's medical records from Vanderbilt University (Bates Nos. 1966-2003);
17. Arrest Report (Bates Nos. 003509-003512);
18. Mittimus for Appearance (Bates No. 000002);
19. General Sessions Night Court Conditions of Release Order (Bates No. 000003);
20. Correct Care Solutions Records, Order to the Jailer / Pregnancy (Bates No. 000119);
21. Correct Care Solutions Records, Intake Provider Orders Pregnancy (Bates No. 000121);
22. Davidson County Sheriff's Office Log Book (Bates Nos. 000080-000087);
23. Correct Care Solutions Records, Provider Orders (Bates No. 000006);
24. Nashville General Hospital Discharge Instructions (Bates Nos. 000129-000133);
25. Correct Care Solutions Medication Administration Record (Bates No. 134);
26. Tennessee Department of State Questionnaire (Villegas Depo Ex. 10);
27. Plaintiff's Interrogatory Responses;
28. Plaintiff's Responses to Request for Admissions;
29. Plaintiff's Deposition;
30. Diagnostic and Statistical Manual of Mental Disorders, Fourth Edition;
31. Posttraumatic Stress Disorder in Litigation: Guidelines for Forensic Assessment;
32. Any documents identified by Plaintiff; and
33. Any exhibits necessary for rebuttal.

Respectfully submitted,

/s/ Kevin C. Klein

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Certificate Of Service

I hereby certify that a copy of the foregoing has been served electronically on William L. Harbison, Phillip F. Cramer, and John L. Farringer, IV, 424 Church Street, Suite 2000, Nashville, Tennessee 37219; and Elliott Ozment, 1214 Murfreesboro Pike, Nashville, Tennessee, 37217; on this 2th day of August, 2011.

s/ Kevin C. Klein

Kevin C. Klein